

**United States Bankruptcy Court**  
**District of New Jersey**  
Caption in Compliance with D.N.J. LBR 9004-1

**DUANE MORRIS LLP**  
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*Counsel for Certain Underwriters at Lloyd's,  
London and Certain London Market Companies*

In re:

THE DIOCESE OF CAMDEN, NEW JERSEY,  
  
Debtor.

Chapter 11

Case No. 20-21257 (JNP)

Honorable Jerrold N. Poslusny, Jr.

**NOTICE OF APPEAL OF ORDER CONFIRMING  
SECOND MODIFIED EIGHTH AMENDED PLAN OF  
REORGANIZATION**

**Part 1: Identify the appellant(s)**

1. Name(s) of appellant(s):

Certain Underwriters at Lloyd's, London, Catalina Worthing Insurance Ltd f/k/a HFPI (as Part VII transferee of Excess Insurance Company Ltd. and London & Edinburgh Insurance Company Ltd.), RiverStone Insurance (UK) Ltd. (as successor in interest to Terra Nova Insurance Company Ltd), and Sompo Japan Nipponkoa Insurance Company of Europe Limited (f/k/a The Yasuda Fire & Marine Insurance Company of Europe Ltd.) (collectively, "London Market Insurers" or "LMI")

2. Position of appellant(s) in the adversary proceeding or bankruptcy case that is the subject of this appeal:

- |   |  |
|---|--|
| For appeals in an adversary proceeding.         | For appeals in a bankruptcy case and not in an adversary proceeding. |
| <input type="checkbox"/> Plaintiff              | <input type="checkbox"/> Debtor                                      |
| <input type="checkbox"/> Defendant              | <input type="checkbox"/> Creditor                                    |
| <input type="checkbox"/> Other (describe) _____ | <input type="checkbox"/> Trustee                                     |
|   | <input checked="" type="checkbox"/> Other (describe) <u>Insurer</u>  |

**Part 2: Identify the subject of this appeal**

1. Describe the judgment, order, or decree appealed from:
  1. *Oral Ruling on May 31, 2022* (“Oral Ruling Approving Disclosure Statement”) [Dkt. 1722], an official transcript of which is attached hereto as **Exhibit A**;
  2. *Order (A) Approving Eighth Amended Disclosure Statement; (B) Establishing Plan Solicitation, Voting and Tabulation Procedures; (C) Scheduling a Confirmation Hearing and Deadline for Filing Objections to Eighth Amended Plan; and (D) Granting Related Relief* (“Disclosure Statement Order”) [Dkt. No. 1818], a copy of which is attached hereto as **Exhibit B**;
  3. *Memorandum Decision* (“Standing Order”) [Dkt. No. 2226], a copy of which is attached hereto as **Exhibit C**;
  4. *Oral Ruling on August 26, 2022* (“Oral Ruling on Discovery Disputes”) [Dkt. 2321], an official transcript of which is attached hereto as **Exhibit D**;
  5. *Order Granting Interstate’s and Century’s Motion to Compel Compliance with Audio Rulings* (“Order on Motion to Compel”) [Dkt. No. 3039], a copy of which is attached hereto as **Exhibit E**;
  6. *Memorandum Decision Denying Confirmation of Eighth Amended Plan* (“Memorandum Decision”) [Dkt. No. 3336], a copy of which is attached hereto as **Exhibit F**;
  7. *Order Denying Confirmation of Eighth Amended Plan of Reorganization* (“Order Denying Eighth Amended Plan”) [Dkt. No. 3435], a copy of which is attached hereto as **Exhibit G**;
  8. *Order Regarding Resolicitation of Plan Proponents’ First Modified Eighth Amended Plan of Reorganization* (“Resolicitation Order”) [Dkt. No. 3447], a copy of which is attached hereto as **Exhibit H**;
  9. *Oral Ruling on December 15, 2023* (“Oral Ruling Denying First Modified Eighth Amended Plan”) [Dkt. No. 3574], an official transcript of which is attached hereto as **Exhibit I**;

10. *Oral Ruling on February 16, 2024* (“Oral Ruling Denying Second Modified Eighth Amended Plan”) [Dkt. No. 3649], an official transcript of which is attached hereto as **Exhibit J**;
11. *Oral Ruling on March 14, 2024* (“Oral Ruling Granting Third Modified Eighth Amended Plan”) [Dkt. No. 3680], an official transcript of which is attached hereto as **Exhibit K**;
12. *Order Confirming Third Modified Eighth Amended Plan of Reorganization* (“Confirmation Order”) [Dkt. No. 3684], an official transcript of which is attached hereto as **Exhibit L**; and
13. All other subsumed judgments, orders, and decrees brought up for review in the appeal.

2. State the date on which the judgment, order, or decree was entered:

1. The Oral Ruling Approving Disclosure Statement was entered on May 31, 2022;
2. The Disclosure Statement Order was entered on June 20, 2022;
3. The Standing Order was entered on August 12, 2022;
4. The Oral Ruling on Discovery Disputes was entered on August 26, 2022;
5. The Order on Motion to Compel was entered on January 6, 2023;
6. The Memorandum Decision was entered on August 29, 2023;
7. The Order Denying Eighth Amended Plan was entered on October 16, 2023;
8. The Resolicitation Order was entered on October 19, 2023;
9. The Oral Ruling Denying First Modified Eighth Amended Plan was entered on December 15, 2023;
10. The Oral Ruling Denying Second Modified Eighth Amended Plan was entered on February 16, 2024;
11. The Oral Ruling Granting Third Modified Eighth Amended Plan was entered on March 14, 2024; and
12. The Confirmation Order was entered on March 15, 2024.

**Part 3: Identify the other parties to the appeal**

List the names of all parties to the judgment, order, or decree appealed from and the names, addresses, and telephone numbers of their attorneys (attach additional pages if necessary):

<p>Certain Underwriters at Lloyd’s, London, and Certain London Market Companies <b>(Appellants)</b></p>	<p><b>DUANE MORRIS LLP</b> Russell W. Roten, Esq. Jeff D. Kahane, Esq. Andrew Mina, Esq. 865 South Figueroa Street Suite 3100 Los Angeles, California 90017-5450 Telephone: (213) 689-7400 Email: rwroten@duanemorris.com jkahane@duanemorris.com amina@duanemorris.com</p> <p>– and –</p> <p><b>DUANE MORRIS LLP</b> Sommer L. Ross, Esq. 1940 Route 70 East, Suite 100 Cherry Hill, NJ 08003-2171 Telephone: 856.874.4200 Email: slross@duanemorris.com</p> <p>– and –</p> <p><b>CLYDE &amp; CO US LLP</b> Catalina J. Sugayan, Esq. Michael L. Norton, Esq. 30 S. Wacker Drive Suite 2600 Chicago, Illinois 60606 Telephone: (312) 635-7000 Email: catalina.sugayan@clydeco.us michael.norton@clydeco.us</p>
<p>The Diocese of Camden, New Jersey <b>(Debtor/Appellee)</b></p>	<p><b>TRENK ISABEL SIDDIQI &amp; SHAHDANIAN P.C.</b> Richard D. Trenk, Esq. Robert S. Roglieri, Esq. 290 W. Mt. Pleasant Ave. Suite 2370 Livingston, New Jersey 07039 Telephone: (973) 533-1000</p>

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Official Committee of Tort Claimants Creditors ( <b>Appellee</b> )	<b>LOWENSTEIN SANDLER LLP</b> Jeffrey D. Prol, Esq. Brent Weisenberg, Esq. Michael A. Kaplan, Esq. Lynda A. Bennett, Esq. Rasmeet Kaur Chahil, Esq. Colleen Restel, Esq. Kenneth A. Rosen One Lowenstein Drive Roseland, New Jersey 07068 Telephone: (973) 597-2500 Email: camdendioceseteam@lowenstein.com jprol@lowenstein.com mkaplan@lowenstein.com lbennett@lowenstein.com rchahil@lowenstein.com crestel@lowenstein.com krosen@lowenstein.com
Interstate Fire & Casualty Company	<b>PARKER, HUDSON, RAINER &amp; DOBBS LLP</b> Harris B. Winsberg, Esq. Matthew M. Weiss, Esq. Matthew G. Roberts, Esq. 303 Peachtree Street NE Suite 3600 Atlanta, Georgia 30308 Telephone: (404) 523-5300 Email: hwinsberg@phrd.com mweiss@phrd.com mroberts@phrd.com  – and –  <b>PARKER, HUDSON, RAINER &amp; DOBBS LLP</b> Todd C. Jacobs, Esq. John E. Bucheit, Esq. Two N. Riverside Plaza Suite 1850 Chicago, Illinois 60606 Telephone: (312) 477-3306 Email: tjacobs@phrd.com

	<p>jbucheit@phrd.com</p> <p>– and –</p> <p><b>WHITE AND WILLIAMS LLP</b>  Siobhain P. Minarovich, Esq.  7 Times Square  Suite 2900  New York, New York 10036  Email: minarovichs@whiteandwilliams.com</p>
Century Indemnity Company	<p><b>O'MELVENY &amp; MYERS LLP</b>  Tancred Schiavoni, Esq.  Samantha M. Indelicato, Esq.  7 Times Square  New York, NY 10036  Telephone: 212-326-2157  Email: tschiavoni@omm.com  sindelicato@omm.com</p> <p>– and –</p> <p><b>STAMOULIS &amp; WEINBLATT LLC</b>  Stamatios Stamoulis, Esq.  Richard C Weinblatt, Esq.  800 N. West Street  Suite 800  Wilmington, Delaware 19801  Telephone: (302) 999-1540  Email: stamoulis@swdelaw.com  weinblatt@swdelaw.com</p> <p>– and –</p> <p><b>SQUIRE PATTON BOGGS (US) LLP</b>  Mark D. Sheridan, Esq.  Mark C. Errico, Esq.  382 Springfield Ave., Suite 300  Summit, New Jersey 07401  Telephone: (973) 848-5600  Email: mark.sheridan@squirepb.com  mark.errico@squirepb.com</p>
The National Catholic Risk Retention Group, Inc.	<p><b>WOMBLE BOND DICKINSON (US) LLP</b>  David M. Banker, Esq.  Edward L. Schnitzer, Esq.</p>

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Granite State Insurance Company and Lexington Insurance Company	<b>RIKER DANZIG LLP</b> Joseph L. Schwartz, Esq. Michael J. Rossignol, Esq. Headquarters Plaza, One Speedwell Avenue Morristown, New Jersey 07962-1981 Telephone: (973) 538-0800 Email: jschwartz@riker.com mrossignol@riker.com
Official Committee of Unsecured Trade Creditors	<b>PORZIO, BROMBERG &amp; NEWMAN, P.C.</b> John S. Mairo, Esq. Warren J. Martin, Jr., Esq. Rachel A. Parisi, Esq. 100 Southgate Parkway P.O. Box 1997 Morristown, New Jersey 07962-1997 Telephone: 973-538-4006 E-mail: jsmairo@pbnlaw.com wjmartin@pbnlaw.com raparisi@pbnlaw.com
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Diocese of Camden Trusts, Inc.; The Tuition Assistance Fund, Inc.; Diocese of Camden Healthcare Foundation, Inc.; The Diocesan Housing Services Corporation of the Diocese of Camden, Inc.; Catholic Charities, Diocese of Camden Inc.; Padre Pio Shrine, Beuna Borough, N.J., Inc.	<b>FLASTER/GREENBERG, P.C.</b> Damien N. Tancredi, Esq. 1717 Arch Street Suite 3300 Philadelphia, Pennsylvania 19103 Telephone: (267) 225-2195 Email: damien.tancredi@flastergreenberg.com
Archbishop Damiano School; Camden Catholic High School; Cathedral of the Immaculate Conception; Christ Our Light; Christ the Good Shepherd; Christ the King; Christ the Redeemer; Church of the Holy Family; Divine Mercy; Holy Angels; Holy Child; Holy Eucharist; Holy Spirit High School; Holy Trinity Parish; Incarnation; Infant Jesus; Mary Mother of Mercy; Mary Queen of All Saints; Master Ecclesiae Chapel; Most Precious Blood; Notre Dame De La Mer; Our Lady of Guadalupe; Our Lady of Hope; Our Lady of Peace; Our Lady of Perpetual Help; Our Lady of Sorrows; Our Lady of the Angels; Our Lady of the Blessed Sacrament; Our Lady of the Lakes; Our Lady, Star of the Sea; Parish of All Saints; Pope Paul VI High School; Sacred Heart Parish; St. Joseph's Catholic Church; St. Peter Roman Catholic Church; St. Andrew of the Apostle; St. Brendan the Navigator; St. Bridget; St. Charles Borromeo; St. Clare of Assisi; St. Damien, St. Elizabeth Ann Seton, St. Gabriel the Archangel; St. Gianna Beretta Molla; St. Joachim; St. John Neumann; St. Joseph Pro-Cathedral; St. Joseph Roman Catholic Church; St. Joseph the Worker; St. Katherine Drexel; St. Mary of Mt. Carmel; St. Mary's Church; St. Mary's R.C. Church; St. Maximilian; St. Michael the Archangel; St. Monica; St. Padre Pio; St.	<b>SHERMAN, SILVERSTEIN, KOHL, ROSE &amp; PODOLSKY, P.A.</b> Arthur J. Abramowitz, Esq. Bruce S. Luckman, Esq. 308 Harper Drive Suite 200 Moorestown, New Jersey 08057 Telephone: (856) 661-2081 Email: abramowitz@shermansilverstein.com bluckman@shermansilverstein.com



<p>Rose of Lima; St. Simon Stock; St. Stephen; St. Teresa of Calcutta; St. Thomas More; St. Thomas Roman Catholic Church; St. Vincent DePaul, Sts. Peter &amp; Paul; The Bishop James T. McHugh; The Catholic Community of the Holy Spirit; The Parish Of The Holy Cross; St. Andrew Kim Korean Mission; St. Josephs Child Development Center; St. Yi Yun Il John Korean Catholic Mission; Saint Joseph High School, Hammonton, N.J., Inc.</p>	
<p>United States Trustee</p>	<p><b>ANDREW R. VARA, UNITED STATES TRUSTEE FOR REGIONS 3 AND 9</b>  Jeffrey M. Sponder, Esq.  Lauren Bielskie, Esq.  One Newark Center  1085 Raymond Boulevard, Suite 2100  Newark, New Jersey 07102  Telephone: (973) 645-3014  Email: Jeffrey.M.Sponder@usdoj.gov  Lauren.Bielskie@usdoj.gov</p>

**Part 4: Optional election to have appeal heard by District Court (applicable only in certain districts)**

If a Bankruptcy Appellate Panel is available in this judicial district, the Bankruptcy Appellate Panel will hear this appeal unless, pursuant to 28 U.S.C. § 158(c)(1), a party elects to have the appeal heard by the United States District Court. If an appellant filing this notice wishes to have the appeal heard by the United States District Court, check below. Do not check the box if the appellant wishes the Bankruptcy Appellate Panel to hear the appeal.

☒ Appellant(s) elect to have the appeal heard by the United States District Court rather than by the Bankruptcy Appellate Panel.

**Part 5: Sign below**

/s/ Sommer L. Ross

Date: March 26, 2024

Signature of attorney for appellant(s) (or  
appellant(s) if not represented by an attorney)

Name, address, and telephone number of  
attorney (or appellant(s) if not represented by  
an attorney):

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